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IN THE UNITED STATES DISTRICT COURT
for the District of Maryland
Baltimore Division

FEB 21 2012

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX

Hassan Crawford,

Civil No.

L12CV0552

Plaintiff,

COMPLAINT

PLAINTIFF DEMANDS TRIAL BY JURY

v.

PORTFOLIO RECOVERY ASSOCIATION,

Defendant.

COMPLAINT FOR VIOLATIONS OF THE FAIR CREDIT REPORTING ACT, THE FAIR DEBT COLLECTION PRACTICES ACT, THE MARYLAND CONSUMER COLLECTION PRACTICES ACT, THE MARYLAND DECEPTIVE AND UNFAIR TRADE PRACTICES ACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, and DEMAND FOR JURY TRIAL and INJUNCTIVE RELIEF

Plaintiff Hassan Crawford alleges as follows:

The Parties

1. At all times herein after mentioned, plaintiff is and was a resident of Baltimore, Maryland.
2. Defendant(s), PORTFOLIO RECOVERY ASSOCIATION, is a corporation incorporated under the laws of CALIFORNIA and having a main office at 120 Corporate Blvd., Norfolk, VA 23502.
3. Defendant(s), PORTFOLIO RECOVERY ASSOCIATION, is registered with the VIRGINIA SECRETARY OF STATE as a Corporation doing business in VIRGINIA.

Jurisdiction

4. The Court has jurisdiction over this action pursuant to 15 U.S.C. § 1681 et seq., the "Fair Credit Reporting Act (FCRA) and 15 U.S.C. §§ 1692-1692p, the "Fair Debt Collection Practices Act."

Defendant's Statutory Violations

5. The Defendant(s) is reporting derogatory information about Plaintiff to one or more consumer reporting agencies (credit bureaus) as defined by 15 U.S.C. § 1681a.

6. Plaintiff has disputed the accuracy of the derogatory information reported by the Defendant to the Consumer Reporting Agencies.

7. Defendant(s) have not responded to Plaintiff's three letters of dispute and validation request by providing evidence of the alleged debt to Plaintiff nor to the Consumer Reporting Agencies.

8. Defendant(s) have not provided notice of this disputed matter to the credit bureaus and is therefore in violation of 15 U.S.C. § 1681s-2 which requires this notice.

9. Defendant(s) have failed to comply with 15 U.S.C. § 1692g in that it has not within 5 days of Plaintiff's initial communication (nor at any other time) sent Plaintiff written documentation of the amount of the debt, the name of the original creditor nor other information required by the Fair Credit Reporting Act.

10. Defendant(s) have failed to complete an investigation of Plaintiff's written dispute and provide the results of an investigation to Plaintiff within the 30 day period as required by 15 U.S.C. § 1681s-2.

11. Defendant(s) have not notified Plaintiff of any determination that Plaintiff's dispute is frivolous within the 5 days required by 15 U.S.C. § 1681s-2, nor at any other time.

Prayer for Relief

12. WHEREFORE,

Plaintiff seeks a reasonable and fair judgment against defendant for willful noncompliance of the Fair Credit Reporting Act and seeks his statutory remedies as defined by 15 U.S.C. § 1681n and demands:

\$1,000 for actual damages

\$25,000 in punitive damages

Permanent injunction against the Defendant(s) from reporting derogatory information about Plaintiff to Consumer Reporting Agencies (credit bureaus)

Permanent injunction against Defendant (s) for selling this alleged debt to any other party

Any further relief which the court may deem appropriate.

Please take notice that the Plaintiff demands trial by jury in this action.

Respectfully Submitted,

By: Hassan Abdul DBA HASSAN CRAWFORD

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Date: February 21, 2012